

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
	:	
Aliya A. Martinez	:	Case No.: 19-11294(elf)
	:	
Debtor	:	Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Aliya A. Martinez, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about March 3, 2019.
2. The Chapter 13 filing was assigned case number 19-11294(elf).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 18, 2019.
4. The Debtor believes that it is in her best financial interest to surrender her home known as and located at 6040 Webster Street, Philadelphia, Pennsylvania 19143.
5. The Debtor wishes to Modify her Chapter 13 Plan to surrender her home.
6. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", and is currently affordable by the Debtor.

**WHEREFORE**, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: June 29, 2020

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street, Suite #502  
Philadelphia, PA 19107